

THE STATE OF NEW HAMPSHIRE
DEPARTMENT OF ENVIRONMENTAL SERVICES
WATER COUNCIL

RECEIVED

SEP 24 2003

Water Council Docket No. 03-09 WC

In Re: Appeal of Town of Chester Conservation Commission

MOTION TO INTERVENE

NOW COMES Mr. Bryan Remillard of 164 North Pond Road, Chester, New Hampshire and through his attorneys Beaumont & Campbell Prof. Ass'n moves to intervene in the above-referenced Appeal pursuant to the provisions of Env-WC 203.12, and in furtherance thereof, says as follows:

1. Mr. Bryan Remillard is a real party and stakeholder in the Appeal brought against the New Hampshire Department of Environmental Services-Wetlands Bureau.
2. Mr. Bryan Remillard is the record titleholder of the property to which the Appeal at issue applies.
3. Mr. Bryan Remillard is the named applicant in the underlying administrative process of the DES Wetlands Bureau.
4. Any decision issued by the Water Council will have a direct effect on the littoral property rights of Mr. Bryan Remillard.
5. Mr. Bryan Remillard desires an opportunity to intervene and take an active role in the defense of the Administrative Decision which is the subject of appeal, to be heard on this matter.

WHEREFORE, the Movant (Bryan Remillard) respectfully requests that the Water Council:

- A. Grant Mr. Bryan Remillard Intervenor status;
- B. Order that Movant be provided the opportunity to participate fully in all

proceedings associated with said Appeal including, but not limited to, the right to receive all notices as a party in interest, the right to present motions and other pleadings, and the right to present argument; and

C. Grant the Movant such other further relief as this Council deems just.

Respectfully submitted,

Bryan Remillard

Dated: September 22nd, 2003

By: 

Bernard H. Campbell, Esquire
Beaumont & Campbell Prof. Ass'n.
One Stiles Road - Suite 107
Salem, New Hampshire 03079
Tel. 603-898-2635

CERTIFICATE of SERVICE

I certify that a copy of the foregoing Motion was sent this 22nd day of September 2003, first class mail postage prepaid to Dean B. Eggert, Esq., Wadleigh, Starr & Peters, PLLC, 95 Market Street, Manchester, NH 03101, representing the appealing party, and to Mark R. Harbaugh, Esq., representing the New Hampshire Department of Environmental Services Legal Unit, Counsel for the Water Division and to Bryan Remillard, 164 North Pond Road, Chester, NH 03036.



Bernard H. Campbell, Esquire